

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

KRYSTAL BELL, as personal representative of
JACOB ADAM MITSCHLEN, deceased,

Plaintiffs,

vs.

No. 1:11-cv-00907 JCH-ACT

BYRON "TREY" ECONOMIDY III,
in his individual capacity, and
CITY OF ALBUQUERQUE,

Defendants.

**DEFENDANTS BYRON "TREY" ECONOMIDY III AND CITY OF ALBUQUERQUE'S
RESPONSES TO PLAINTIFF'S SECOND SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

COME NOW Defendants City of Albuquerque and Byron "Trey" Economy III, by and through their counsel of record, Kathryn Levy, and hereby respond to Plaintiff's Second Set of Interrogatories and Requests for Production of Documents as follows:

INTERROGATORIES

INTERROGATORY NO. 9:

Please identify by date and position each instance in which Defendant Byron "Trey" Economy applied for employment with the City of Albuquerque.

ANSWER:

Defendant Economy applied for the position of Police Cadet with the City of Albuquerque Police Department on September 16, 2003.

INTERROGATORY NO. 12:

Please identify each criminal intelligence report, hotsheet, officer safety bulletin, intelligence briefing, and other record generated by, or making reference to, the Albuquerque Police Department Special Investigations Division or Criminal Intelligence Unit that was sent to or received by Defendant Byron "Trey" Economidy III between December 1, 2009, and February 10, 2011.

ANSWER:

Objection. Defendant objects to the request on the grounds that the information sought is overly broad, vague, and not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 15: Please produce each record relating to Defendant Economidy which has previously been produced in discovery in *Wharton v. City of Albuquerque*, No. D202CV201006590 (2nd Jud. Dist. Ct. filed May 28, 2010).

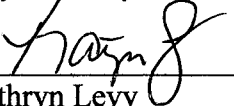
RESPONSE:

Defendant objects to the request on the grounds that the information sought is overly broad and not reasonably calculated to lead to the discovery of admissible evidence.

CITY OF ALBUQUERQUE

David Tourek.

City Attorney



Kathryn Levy

Deputy City Attorney

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